

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

DATATRAK International, Inc.,

Plaintiff,

v.

Medidata Solutions, Inc.,

Defendant.

Case No. 1:11-cv-00458-PAG

Hon. Patricia A. Gaughan

**MEDIDATA'S MOTION TO STAY LITIGATION PENDING *EX PARTE*  
REEXAMINATION OF THE PATENT-IN-SUIT**

Medidata moves the Court to stay litigation starting immediately and continuing until the United States Patent and Trademark Office has completed *ex parte* reexamination of the patent-in-suit, U.S. Patent No. 7,464,087. As set forth in the Memorandum in Support, a stay would simplify the issues before the Court without imposing undue prejudice on DATATRAK. For these reasons and those set forth in detail in the Memorandum in Support, Medidata respectfully requests that the Court grant this Motion to Stay this action.

DATED: October 28, 2011

By: /s/ David A. Schaefer  
David A. Schaefer  
das@mccarthylebit.com  
McCARTHY, LEBIT, CRYSTAL &  
LIFFMAN CO., LPA  
101 West Prospect Avenue, Suite 1800  
Cleveland, Ohio 44115  
(216) 586-5479 (Telephone)  
(216) 696-1210 (Facsimile)

Janine A. Carlan  
carlan.janine@arentfox.com  
Alec P. Rosenberg  
rosenberg.alec@arentfox.com  
Aziz Burgy  
burgy.aziz@arentfox.com  
Arent Fox LLP  
1050 Connecticut Avenue, NW  
Washington, DC 20036-5339  
(202) 857-6000 (Telephone)  
(202) 857-6395 (Facsimile)

Attorneys for Defendant  
Medidata Solutions, Inc.